

Exhibit B

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
STATE OF MISSOURI

VICKIE FORREST, et al.,

Plaintiffs,

vs.

JOHNSON & JOHNSON, et al.,

Defendants

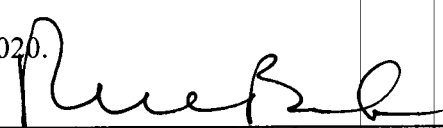
Case No. 1522-CC00419-02

Division 1

ORDER FOR COMMISSION FOR ISSUANCE OF PENNSYLVANIA SUBPOENA
UNDER 231 Pa. Code Rule 4009.21

Plaintiffs' Application for Commission is hereby GRANTED for good cause shown. Plaintiffs having demonstrated the need for certain information and documents to be produced in connection with the matter herein and requiring a subpoena from the Circuit Court of Pennsylvania, Bucks County, or such other coordinate court, through the undersigned Judge, hereby respectfully commissions and solicits the assistance of the Circuit Court of Pennsylvania, Bucks County, or such other coordinate office as it may designate, for the issuance of a Pennsylvania subpoena under 231 Pa. Code Rule 4009.21 compelling deposition testimony and the production of documents by John C. O'Shaughnessy, 19 Creekview Ln, Yardley, PA 19067, regarding the Johnson & Johnson Defendants, per the attached Notice of Deposition, incorporated as Exhibit A.

SO ORDERED this 14th day of December, 2020.


Judge Rex M. Burlison

cc: All Counsel of Record

DIV 1

FILED
JAN 21 2021
22ND JUDICIAL CIRCUIT
CIRCUIT CLERK'S OFFICE
BY _____ DEPUTY

**MISSOURI CIRCUIT COURT
TWENTY-SECOND JUDICIAL CIRCUIT
ST. LOUIS CITY**

VICKIE FORREST, et al.,

Plaintiffs,

vs.

JOHNSON & JOHNSON, et al.,

Defendants

Case No. 1522-CC00419-02

Division 10

ORDER

Cause comes for hearing on the Johnson & Johnson Defendants' Motions to Reconsider the Issuance of Commissions and for Protective Orders Barring Depositions of John O'Shaughnessy, Carol Goodrich, and John McKeegan.

On December 3, 2020, Plaintiffs herein filed Applications for Commissions to take Out-of-State Depositions of four former employees of the Johnson & Johnson Defendants, John O'Shaughnessy, Carol Goodrich-Toller, John McKeegan, and Steven Mann, in connection with the above-styled matter involving Johnson's Baby Powder and Shower to Shower allegedly causing Plaintiffs to develop ovarian cancer. Those Applications were ordered granted on December 14, 2020, prior to objection or hearing on the Applications.

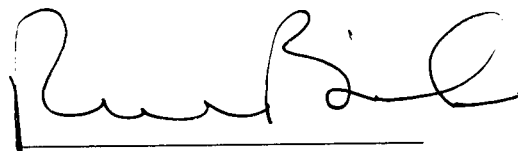
On December 18, 2020, Defendants filed Motions to Reconsider the Orders granting Plaintiffs' Applications as to O'Shaughnessy, Goodrich-Toller, and McKeegan and for a Protective Order barring these depositions. Defendants do not object to the Application or production as to Mann.

On December 22, 2020, the Motions to Reconsider were called, heard, argued, and ruled on as follows:

1. The Court finds Plaintiffs have met their burden under Missouri Rule of Civil Procedure 56.01 that the information sought in deposing these individuals is relevant and likely to lead to the discovery of admissible evidence;
2. The Court finds the requested depositions do not constitute “annoyance, embarrassment, oppression, or undue burden or expense” required under Rule 56.01(c) to justify issuance of a protective order or to otherwise preclude these depositions.
3. The Court finds, specifically as to deponent O’Shaughnessy, that while certain information held by the deponent may be subject to privilege, other information ripe for discovery is likely to be had falling outside of the scope of privilege, and any objections in deposition as to privilege can be addressed through contemporaneous objections and rulings by the duly appointed Special Discovery Master, Hon. Glenn Norton (ret.).

Accordingly, Defendants’ Motions to Reconsider are DENIED and the Court’s Orders of December 14, 2020 on Plaintiffs’ Applications for Commissions to take Out-of-State Depositions remain.

Date: January 20, 2021

A handwritten signature in black ink, appearing to read 'Rex M. Burlison', written over a horizontal line.

Rex M. Burlison
Circuit Judge
Division 10